

APPENDIX A

Technical Statement of Jefferson G. Brock
(March 23, 2004)

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

TECHNICAL EXHIBIT

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PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

TECHNICAL STATEMENT

1. This technical statement and attached exhibits have been prepared on behalf of Sea-Comm, Inc. ("SCI"), licensee of WBNU, Channel 279C3, Shallotte, North Carolina; WBNE, Channel 229A, Wrightsville Beach, North Carolina; and WWTB, Channel 280C3, Topsail Beach, North Carolina. SCI herein requests the following changes to the Commission's Table of FM Allotments, §73.202(b) of the rules. SCI requests the upgrade of WBNU to Channel 279C2 and the re-allotment of the upgraded channel to Wrightsville Beach, North Carolina. In order to accommodate the upgrade and re-allotment of WBNU, it is requested that WWTB, Topsail Beach, North Carolina, be downgraded and changed in channel and community of license to Channel 281A at Richlands, North Carolina. Further, so as to not leave Topsail Beach, North Carolina, without service, SCI also requests that station WBNE, Channel 229A, Wrightsville Beach, North Carolina, be upgraded to Channel 229C3 and the improved channel be re-allotted to Topsail Beach, North Carolina. It is noted that while WBNE is the only service in Wrightsville Beach, its service will be replaced by the proposed WBNU portion of this request. In each case, the respective existing channel at each community is mutually exclusive with the respective proposed channel for that community. This proposal will create expanded service for two facilities and create a first new local service for the community of Richlands, North Carolina.

PROPOSAL

2. Channel 279C2 can be allotted to Wrightsville Beach, North Carolina, with a site restriction of 25.0 kilometers south-southwest of the community to avoid shortspacing to WRHD, Channel 279C1, Williamston, North Carolina, and WRCQ, Channel 278C2, Dunn, North Carolina. The geographic coordinates for the proposed allocation site are North Latitude 33° 59' 56" and West Longitude 77° 54' 35". Exhibit #1 is a map depicting where a transmitter site for Channel 279C2 can be located and meet the Commission's rules, assuming station WWTB is moved to Channel 281A at Richlands, North Carolina. Exhibit #2 is a §73.207 spacing study from the proposed site, demonstrating that Channel 279C2 meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities (with the exception of the licensed WBNU and WWTB facilities). From the proposed reference site, a 3.16 mV/m contour will be placed over all of Wrightsville Beach, North Carolina.

3. Channel 281A can be allotted to Richlands, North Carolina, with a site restriction of 12.0 kilometers southeast of the community in order to specify an existing tower location. The geographic coordinates for the reference site for the proposed allotment of Channel 281A at Richlands, North Carolina, are North Latitude 34° 49' 40" and West Longitude 77° 27' 30". Exhibit #3 is a map depicting the area in which to locate a transmitter site for Channel 281A at Richlands, North Carolina. Further, Exhibit #4 is a §73.207 spacing study demonstrating that Channel 281A meets the Commission's minimum distance separation requirements to all

licensed, applied for or proposed facilities, with the exception of the licensed facilities of WWTB. From the proposed reference site, a 3.16 mV/m (70 dBu) signal will be provided over all of Richlands, North Carolina.

4. Channel 229C3 can be allotted to Topsail Beach, North Carolina, with a site restriction of 6.0 kilometers north to avoid shortspacing to WDZD, Channel 228A, Ocean Isle Beach, North Carolina. The geographic coordinates of the reference site for the allotment of Channel 229C3 at Topsail Beach, North Carolina are North Latitude 34° 25' 37" and West Longitude 77° 38' 33". Exhibit #5 is a map which depicts an area where a transmitter site for Channel 229C3 can be located to service Topsail Beach, North Carolina. Exhibit #6 is a §73.207 spacing study which shows that Channel 229C3, from the reference site, meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities (with the exception of the licensed WBNE facility). From the proposed reference site, a 3.16 mV/m (70 dBu) signal will be provided over all of Topsail Beach, North Carolina.

5. Therefore, SCI herein requests the following changes in §73.202(b) of the Commission's rules.

Shallotte, North Carolina

Present	Proposed
279C3, 292A	292A

Wrightsville Beach, North Carolina

Present	Proposed
229A	279C2

Topsail Beach, North Carolina

Present	Proposed
280C3	229C3

Richlands, North Carolina

Present	Proposed
None	281A

PUBLIC INTEREST

6. The allotment of Channel 279C2 to Wrightsville Beach will provide that community with its first expanded area service and provide a replacement for Channel 229A, without depriving Shallotte, North Carolina, of its only local service, since WLTT, Channel 292A, and WVCB, 1410 kHz, will remain licensed to Shallotte. Further, the allotment of Channel 281A to Richlands, North Carolina, will not deprive Topsail Beach, North Carolina, of its only local service since station WBNE, Channel 229C3, will be re-allotted to Topsail Beach, thus providing Richlands with its first locally licensable station. Finally, WBNE's re-allotment to Topsail Beach, North Carolina, will not deprive Wrightsville Beach, North Carolina, of service, since station WBNU is proposed to be re-allotted to Wrightsville Beach, as part of this proposal. A re-allotted WBNU, operating on Channel 279C2 at Wrightsville Beach, North Carolina, will

provide 60 dBu service to 239,765 persons in 8,560.3 square kilometers.¹ WWTB, operating on Channel 281A at Richlands, North Carolina, will provide 60 dBu (1.0 mV/m) service to 142,508 persons in 2,516.1 square kilometers.² Finally, a re-allotted WBNE, operating on Channel 229C3 at Topsail Beach, North Carolina, will provide 60 dBu (1.0 mV/m) service to 215,742 persons in 4,802.9 square kilometers. Once Channel 279C2 is allotted to Wrightsville Beach, North Carolina; Channel 281A is allotted to Richlands; and Channel 229C3 is allotted to Topsail Beach, North Carolina; Sea-Comm, Inc., will submit FCC Form 301 applications to implement the changes in community of license.

7. As a result of the proposed changes herein, the present 60 dBu contours of each station will be altered, causing gain and loss areas. As indicated on Exhibit #7, the WBNU relocation will create a gain area of 190,274 persons in 5,813.3 square kilometers. There will also be a loss area in which there are 49,984 persons in 2,086.4 square kilometers. Both the gain and the loss areas are presently receiving service from a minimum of five full-time services.³ As such, the areas are considered well-served.⁴

8. As shown on Exhibit #8, the WWTB relocation will create a gain area of 22,544 persons in 1,452.1 square kilometers. There will also be a loss area in which there are 40,947

1) Based on the licensed facilities of WJZX, utilizing 2000 US Census data.

2) Based on the licensed facilities of WLOW, utilizing 2000 US Census data.

3) A list of the stations serving the gain and loss area is attached as Exhibit #7A. It is noted that a portion of the gain and loss area extends into the Atlantic Ocean. Since this is an unpopulated area, analysis of service over the water was not undertaken.

4) Since the proposed WBNU re-allotment to Wrightsville Beach is a replacement for the WBNE service (which is to be re-allotted to Topsail Beach, North Carolina), a study of Wilmington, North Carolina Urbanized Area is not being undertaken, but can be submitted upon request.

persons in 3,524.2 square kilometers. Both the gain and the loss areas are presently receiving service from a minimum of five full-time services.⁵ As such, the areas are considered well-served.

9. Finally, as depicted on Exhibit #9, the WBNE relocation will create a gain area of 51,965 persons in 2,701.6 square kilometers. There will also be a loss area in which there are 26,083 persons in 408.7 square kilometers. Both the gain and the loss areas are presently receiving service from a minimum of five full-time services.⁶ As such, the gain and loss areas are considered well-served.

10. While Richlands, North Carolina, is not located in an Urbanized Area, as designated by the United States Census, the proposed reference site for WWTB at Richlands is in close proximity to the Jacksonville, North Carolina, Urbanized Area. From the proposed allocation reference site, a 70 dBu signal will cover 84.1% of the Jacksonville, North Carolina, Urbanized Area, as shown on Exhibit #10.⁷ Details regarding the independence of Richlands, North Carolina, from Jacksonville is contained elsewhere in this instant request.⁸

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- 5) A list of the stations serving the gain and loss area is attached as Exhibit #8A. It is noted that a portion of the gain and loss area extends into the Atlantic Ocean. Since this is an unpopulated area, analysis of service over the water was not undertaken.
 - 6) A list of the stations serving the gain and loss area is attached as Exhibit #9A. It is noted that a portion of the gain and loss area extends into the Atlantic Ocean. Since this is an unpopulated area, analysis of service over the water was not undertaken.
 - 7) Also, the 60 dBu contour will cover 100% of the Jacksonville Urbanized Area. These figures were calculated using a polar planimeter.
 - 8) The community of Richlands is 19.5kilometers (12.1 miles) from Jacksonville, North Carolina.

11. The foregoing technical statement was prepared on behalf of Sea-Comm, Inc., by Graham Brock, Inc., its Technical Consultants. All data related to FM facilities was extracted from the CDBS database and all population data was extracted from the 2000 census database. We assume no liability for errors or omissions in those databases that may be adverse to the requests contained herein.

Graham Brock, Inc. - Broadcast Technical Consultants

Reference

Latitude: 33-59-56 N
Longitude: 077-54-35 W
Channel: 279C2

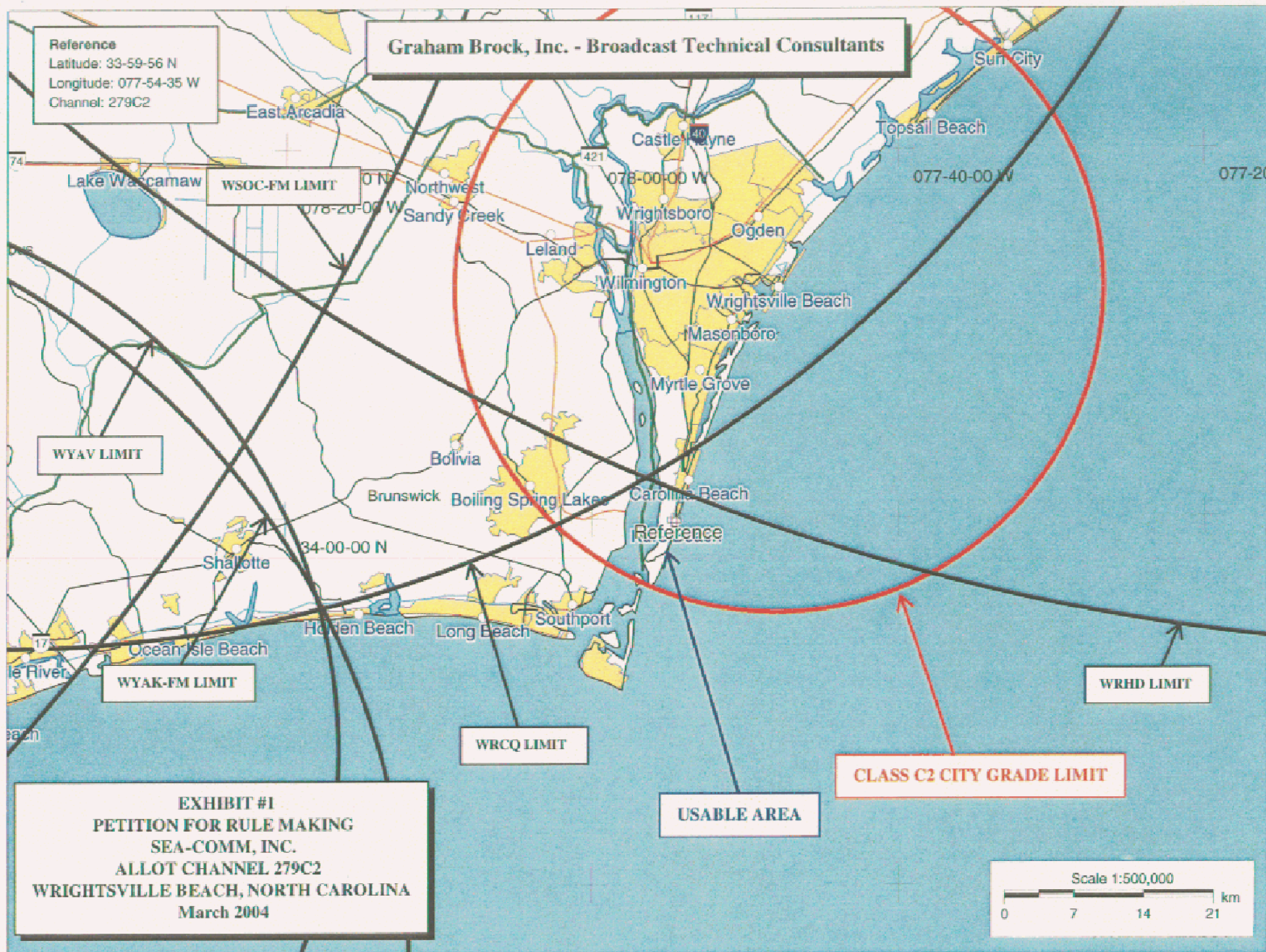


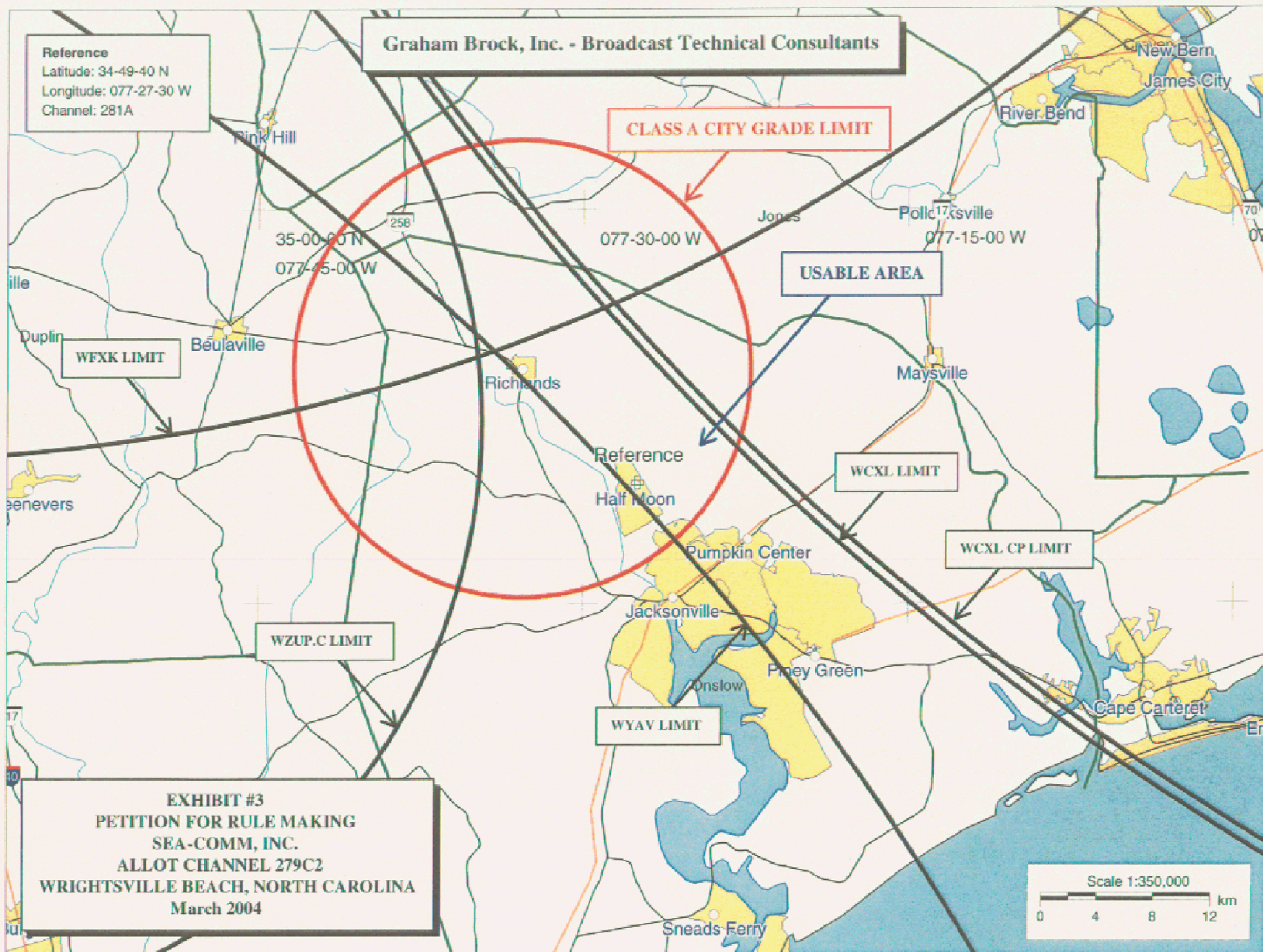
EXHIBIT #1
PETITION FOR RULE MAKING
SEA-COMM, INC.
ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
March 2004

PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

EXHIBIT #2

Allocation study for Wrightsville Beach, North Carolina
Using proposed allocation site as reference

REFERENCE	CLASS = C2				DISPLAY DATES	
33 59 56 N	Current				DATA 03-12-04	
77 54 35 W	Spacings				SEARCH 03-18-04	
----- Channel 279 - 103.7 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng.	Ant	Power	HAAT	
AD279	ADD 279C2	Wrightsville Beach	NC 0.00	0.0	190.0	-190.00
	33 59 56	77 54 35	0.000 kW 0 M			
	Sea-Comm, Inc.					
WBNU	LIC 279C3	Shallotte	NC 42.85	270.1	177.0	-134.15
	33 59 55	78 22 25 CN	25.000 kW	100 M		
	Sea-comm, Inc.					
	BLH-19940210KA					
WBNU.C	CP 279C3	Shallotte	NC 42.85	270.5	177.0	-134.15
	34 00 04	78 22 25 CX	25.000 kW	99 M		
	Sea-comm, Inc.					
	BPH-20001114ABL					
WWTB	LIC-N 280C3	Topsail Beach	NC 67.24	35.0	117.0	-49.76
	34 29 38	77 29 18 NCN	21.500 kW	100 M		
	Sea-comm, Inc.					
	BLH-19930920KF					
	> to Channel 281A Richlands, North Carolina					
WRHD	LIC-D 279C1	Williamston	NC 226.89	21.6	224.0	2.89
	35 53 47	76 58 58 DCX	100.000 kW	299 M		
	ABG North Carolina, LLC					
	BLH-20020910ABC					
WRCQ	LIC 278C2	Dunn	NC 135.12	330.2	130.0	5.12
	35 03 09	78 38 54 CN	48.000 kW	153 M		
	Cumulus Licensing LLC					
	BLH-19900207KB					
WYAV	LIC 281C1	Myrtle Beach	SC 114.77	247.0	79.0	35.77
	33 35 27	79 02 55 CN	100.000 kW	299 M		
	NM Licensing, LLC					
	BLH-19980731KA					
WYAKFM	CP -N 276C3	Surfside Beach	SC 92.73	255.4	56.0	36.73
	33 47 06	78 52 44 NCX	8.000 kW	166 M		
	Cumulus Licensing LLC					
	BPH-19991008AAM					
WYAKFM	LIC-N 276C3	Surfside Beach	SC 92.73	255.4	56.0	36.73
	33 47 06	78 52 44 NCN	8.000 kW	161 M		
	Cumulus Licensing LLC					
	BLH-19970519KC					
WSOCFM	LIC-N 279C	Charlotte	NC 290.11	299.5	249.0	41.11
	35 15 06	80 41 12 NC	100.000 kW	411 M		
	Infinity Radio Holdings					
	BLH-19990830AAS					
AD281	ADD 281A	Richlands	NC 100.87	24.1	55.0	45.87
	34 49 40	77 27 30	0.000 kW 0 M			
	Sea-Comm, Inc.					
WEZL	LIC 278C1	Charleston	SC 221.93	234.2	158.0	63.93
	32 49 04	79 50 08 CY	100.000 kW	201 M		
	Citicasters Licenses, L.P.					
	BLH-19811208AA					



PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

EXHIBIT #4

Allocation study for Richlands, North Carolina
Using proposed allocation site as reference

REFERENCE	CLASS = A				DISPLAY DATES		
34 49 40 N					DATA 03-12-04		
77 27 30 W	Current Spacings				SEARCH 03-18-04		
----- Channel 281 - 104.1 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	
	N. Lat.	W. Lng. Ant	Power	HAAT			
AD281	ADD 281A	Richlands	NC 0.00	0.0	115.0	-115.00	
	34 49 40	77 27 30	0.000 kW 0 M				
	Sea-Comm, Inc.						
WWTB	LIC-N 280C3	Topsail Beach	NC 37.14	184.2	89.0	-51.86	
	34 29 38	77 29 18 NCN	21.500 kW	100 M			
	Sea-comm, Inc. BLH-19930920KF						
WYAV	LIC 281C1	Myrtle Beach	SC 200.76	227.2	200.0	0.76	
	33 35 27	79 02 55 CN	100.000 kW	299 M			
	NM Licensing, LLC BLH-19980731KA						
WCXL	LIC 281C1	Kill Devil Hills	NC 206.70	45.1	200.0	6.70	
	36 07 42	75 49 39 CY	100.000 kW	299 M			
	Max Radio Of The Carolinas BLH-19980812KC						
WCXL.C	CP 281C1	Kill Devil Hills	NC 207.45	45.0	200.0	7.45	
	36 08 08	75 49 28 CX	100.000 kW	296 M			
	Max Radio Of The Carolinas BPH-20031027ABB						
WFXK	LIC 282C1	Tarboro	NC 145.18	338.1	133.0	12.18	
	36 02 22	78 03 44 CN	100.000 kW	299 M			
	Radio One Licenses, LLC BLH-19900209KD						
WZUP.C	CP 284C3	La Grange	NC 58.82	326.2	42.0	16.82	
	35 16 02	77 49 09 CX	25.000 kW	100 M			
	Conner Media Corporation BPH-20030203AFT						
WZUP	LIC-N 284A	Rose Hill	NC 53.14	274.4	31.0	22.14	
	34 51 48	78 02 16 NCN	2.800 kW	78 M			
	Conner Media Corporation BLH-19930128KB						
ALLO	RSV 284C3	La Grange	NC 67.24	316.7	42.0	25.24	
	35 16 00	77 58 00	25.000 kW	100 M			
	RM-10406						
WERO	LIC 227C	Washington	NC 59.91	5.6	29.0	30.91	
	35 21 55	77 23 38 CN	100.000 kW	543 M			
	NM Licensing, LLC BLH-19791206AF						
WFPF.C	CP 283A	Aurora	NC 68.09	55.3	31.0	37.09	
	35 10 29	76 50 35 CN	6.000 kW	100 M			
	Media East, LLC BPH-19970227MD						
AD279	ADD 279C2	Wrightsville Beach	NC 100.87	204.3	55.0	45.87	
	33 59 56	77 54 35	0.000 kW 0 M				
	Sea-Comm, Inc.						
WRHD	LIC-D 279C1	Williamston	NC 126.18	19.8	75.0	51.18	
	35 53 47	76 58 58 DCX	100.000 kW	299 M			
	ABG North Carolina, LLC BLH-20020910ABC						

Graham Brock, Inc. - Broadcast Technical Consultants

Reference
Latitude: 34-25-37 N
Longitude: 077-38-33 W
Channel: 229C3

CLASS C3 CITY GRADE LIMIT

WERO LIMIT

WKXS-FM LIMIT

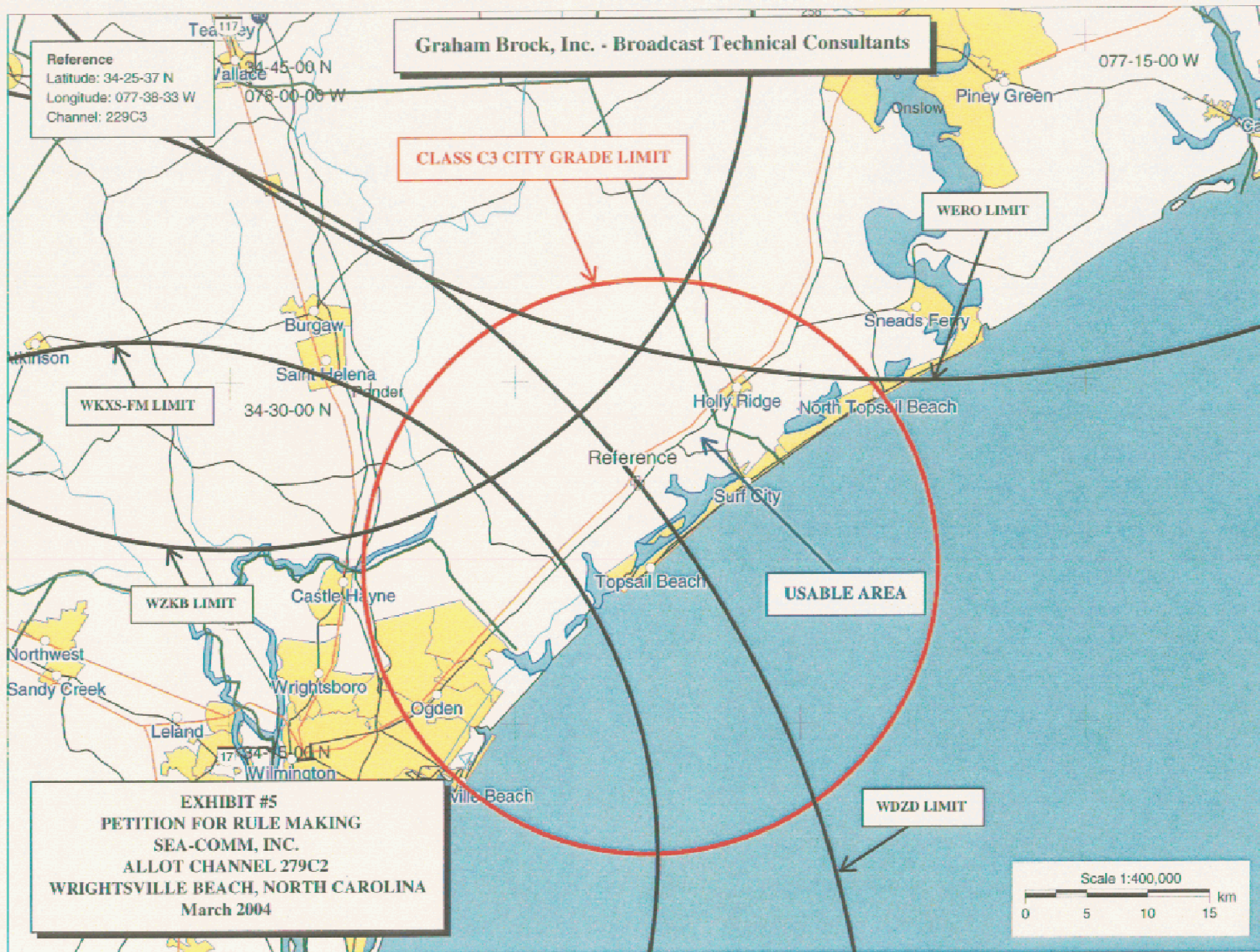
WZKB LIMIT

USABLE AREA

WDZD LIMIT

EXHIBIT #5
PETITION FOR RULE MAKING
SEA-COMM, INC.
ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
March 2004

Scale 1:400,000
0 5 10 15 km



PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

EXHIBIT #6

Allocation study for Topsail Beach, North Carolina
Using proposed allocation site as reference

REFERENCE			CLASS = C3		DISPLAY DATES	
34 25 37 N			Current	Spacings	DATA	03-12-04
77 38 33 W			Channel 229 - 93.7 MHz		SEARCH	03-18-04

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Ant	Power	HAAT		

AD229	ADD 229C3	Topsail Beach	NC 0.00	0.0	153.0	-153.00
	34 25 37	77 38 33	0.000 kW	0 M		
	Sea-Comm, Inc.					
WBNE	LIC-N 229A	Wrightsville Beach	NC 20.24	226.3	142.0	-121.76
	34 18 04	77 48 07	6.000 kW	100 M		
	Sea-comm, Inc. BLH-20001215AAO					
* WDZD	LIC-Z 228A	Ocean Isle Beach	NC 88.94	231.5	89.0	-0.06
	33 55 37	78 23 48	6.000 kW	100 M		
	Qantum Of Myrtle Beach Lic. BLH-19990204KC					
WZKB	LIC 232A	Wallace	NC 49.24	318.5	42.0	7.24
	34 45 29	78 00 00	3.300 kW	90 M		
	Christian Listening Net. BMLH-19920601KE					
WKXSFM	LIC 231A	Leland	NC 50.60	232.7	42.0	8.60
	34 09 03	78 04 48	5.000 kW	41 M		
	Cumulus Licensing LLC BMLH-20011012ABC					
WERO	LIC 227C	Washington	NC 106.54	12.2	96.0	10.54
	35 21 55	77 23 38	100.000 kW	543 M		
	NM Licensing, LLC BLH-19791206AF					
WRQR	LIC 283A	Wilmington	NC 40.07	223.9	12.0	28.07
	34 10 00	77 56 40	3.100 kW	137 M		
	Ocean Broadcasting II, LLC BLH-19990629KC					
RADD	ADD 230C	Cary	NC 211.68	319.7	176.0	35.68
	35 52 15	79 09 40	100.000 kW	600 M		
WRSN	LIC-D 230C	Burlington	NC 211.68	319.7	176.0	35.68
	35 52 15	79 09 40	100.000 kW	385 M		
	Capstar TX Limited Partnership BLH-19940523KB					
RDEL	DEL 230C	Burlington	NC 211.68	319.7	176.0	35.68
	35 52 15	79 09 40	100.000 kW	600 M		
WJXYFM	LIC 230A	Conway	SC 130.74	240.1	89.0	41.74
	33 50 07	78 52 06	3.700 kW	128 M		
	Cumulus Licensing LLC BLH-19960529KB					
WWEA	LIC 231C3	Oriental	NC 97.73	49.0	43.0	54.73
	35 00 02	76 49 58	11.000 kW	148 M		
	ABG North Carolina, LLC BLH-19930326KA					
WXJY	LIC 229A	Georgetown	SC 199.92	230.3	142.0	57.92
	33 16 05	79 17 49	6.000 kW	96 M		
	Cumulus Licensing LLC BLH-20031114AIW					

* Note: This shortage is less than 0.49 km and therefore rounds to zero.

Reference

Latitude: 33-59-56 N
Longitude: 077-54-35 W
Channel: 279C2

Graham Brock, Inc. - Broadcast Technical Consultants

WBNU

BLH-19940210KA
Latitude: 33-59-55 N
Longitude: 078-22-25 W
ERP: 25.00 kW
Channel: 279C3

AUTHORIZED WBNU 60 dBu

FM STATIONS SERVING
GAIN AND LOSS AREA

EXHIBIT #7
PETITION FOR RULE MAKING
SEA-COMM, INC.

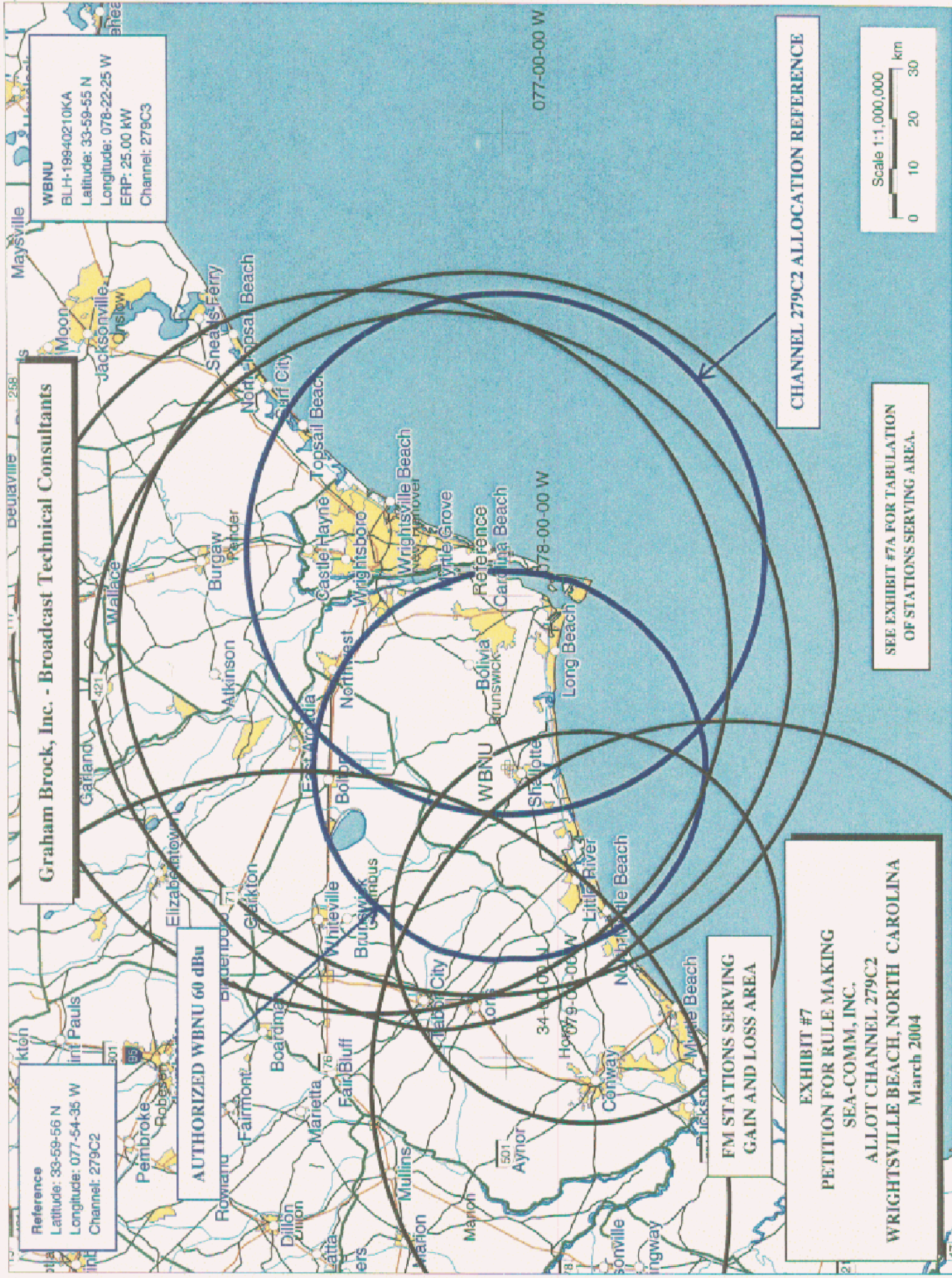
ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA

March 2004

CHANNEL 279C2 ALLOCATION REFERENCE



SEE EXHIBIT #7A FOR TABULATION
OF STATIONS SERVING AREA.



PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

EXHIBIT #7A

Tabulation of FM Stations in WBNU Gain and Loss Area

<u>Call Sign</u>	<u>Channel/Class</u>	<u>City/State</u>	<u>60 dBu ⁹</u> <u>Reference Distance</u>
WHQR	217C	Wilmington, NC	75.9
WMNX	247C1	Wilmington, NC	72.3
WKXB	260C1	Burgaw, NC	72.0
WEVZ	290C3	North Myrtle Beach, NC	39.1
WGNI	274C1	Wilmington, NC	72.3
WYAV	281C1	Myrtle Beach, NC	72.3
WEGX	225C	Dillon, NC	86.3

9) Maximum distance for class except for Class C stations. Actual power and height of Class C stations have been used to determine reference distance.

Graham Brock, Inc. - Broadcast Technical Consultants

CHANNEL 281A ALLOCATION REFERENCE

WWTB
BLH-19930920KF
Latitude: 34-29-38 N
Longitude: 077-29-18 W
ERP: 21.50 kW
Channel: 280C3

Reference
Latitude: 34-49-40 N
Longitude: 077-27-30 W
Channel: 281A

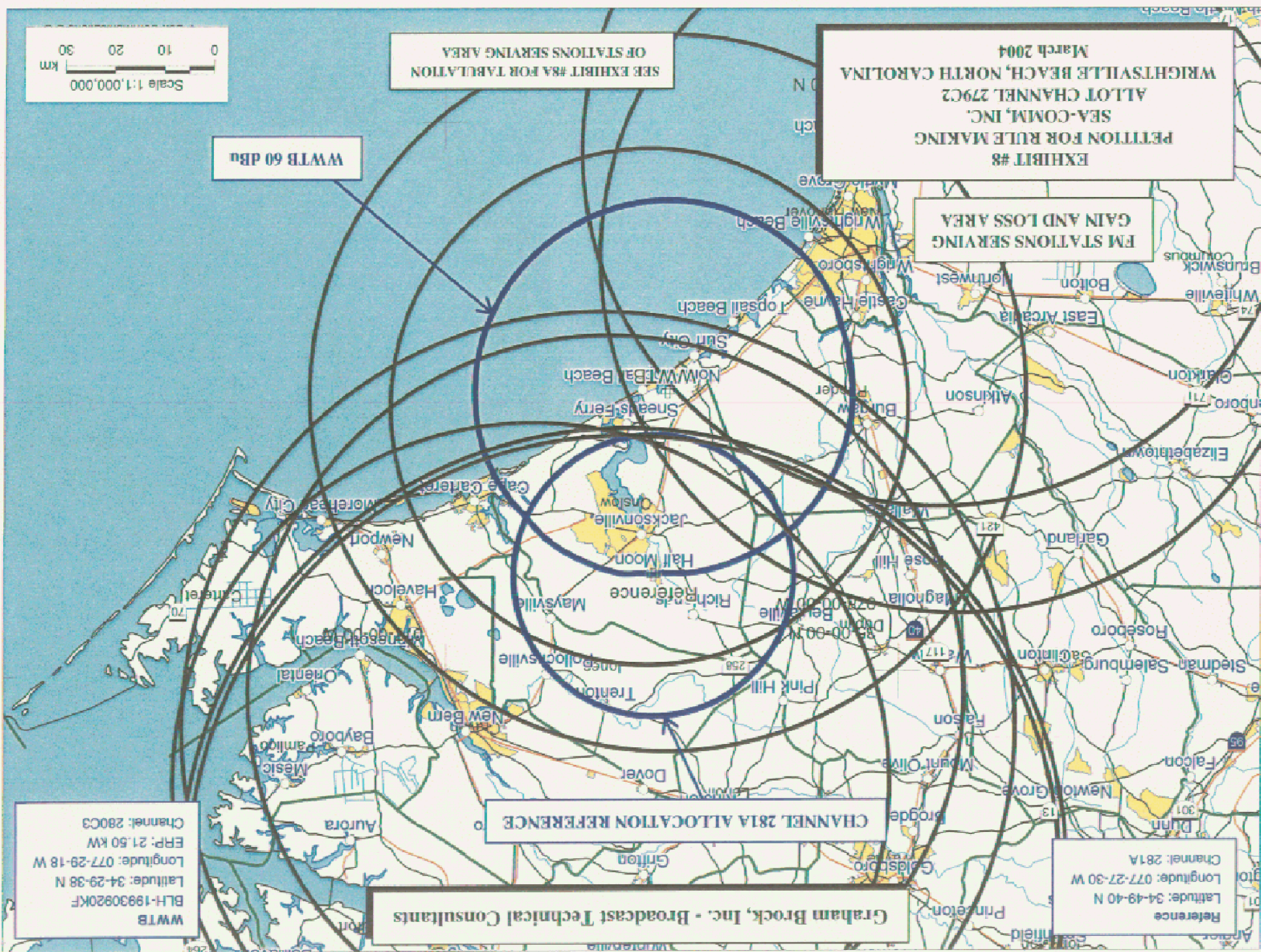
FM STATIONS SERVING
GAIN AND LOSS AREA

EXHIBIT #8
PETTION FOR RULE MAKING
SEA-COMM, INC.
ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
March 2004

SEE EXHIBIT #8A FOR TABULATION
OF STATIONS SERVING AREA

WWTB 60 dBu

Scale 1:1,000,000
0 10 20 30
km



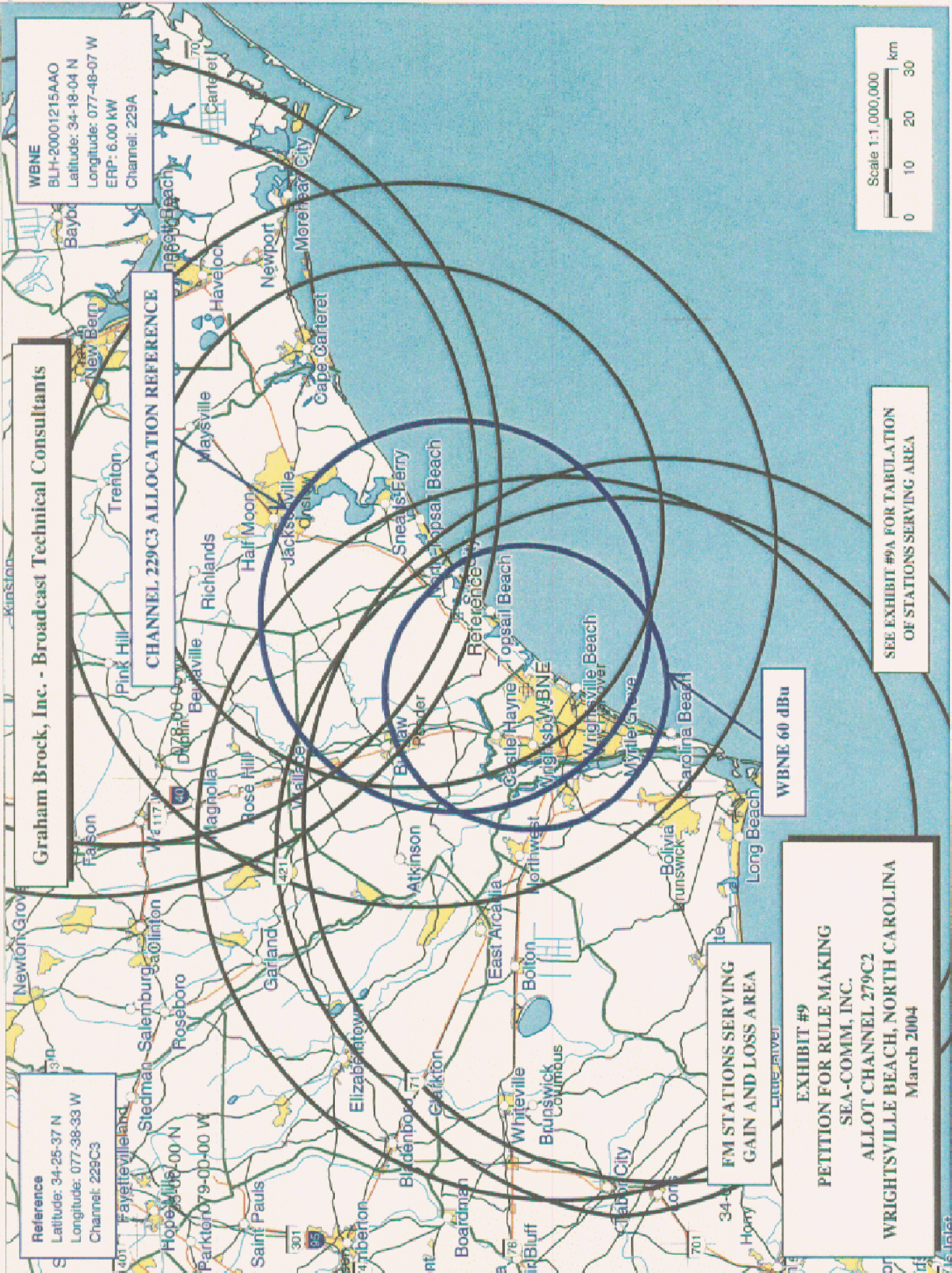
PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
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March 2004

EXHIBIT #8A

Tabulation of FM Stations in WWBT Gain and Loss Area

<u>Call Sign</u>	<u>Channel/Class</u>	<u>City/State</u>	<u>60 dBu¹⁰</u> <u>Reference Distance</u>
WKXB	260C1	Burgaw, NC	72.3
WGNI	274C1	Wilmington, NC	72.3
WKOQ	254C1	Jacksonville, NC	72.3
WQSL	222C2	Jacksonville, NC	52.2
WXQR-FM	288C2	Jacksonville, NC	52.2
WRNS-FM	236C	Kinston, NC	84.1
WSFL-FM	293C1	New Bern, NC	72.3
WIKS	270C1	New Bern, NC	72.3
WNCT-FM	300C	Greenville, NC	87.8
WERO	227C	Washington, NC	89.3

10) See Footnote 9 supra.



Reference

Latitude: 34-25-37 N
Longitude: 077-38-33 W
Channel: 229C3

Graham Brock, Inc. - Broadcast Technical Consultants

WBNE

BLH-20001215AAO
Latitude: 34-18-04 N
Longitude: 077-48-07 W
ERP: 6.00 kW
Channel: 229A

CHANNEL 229C3 ALLOCATION REFERENCE

**FM STATIONS SERVING
GAIN AND LOSS AREA**

WBNE 60 dBu



SEE EXHIBIT #9A FOR TABULATION
OF STATIONS SERVING AREA

**EXHIBIT #9
PETITION FOR RULE MAKING
SEA-COMM, INC.**

**ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
March 2004**

PETITION FOR RULE MAKING
SEA-COMM, INC.
RE-ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
RE-ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
RE-ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
March 2004

EXHIBIT #9A

Tabulation of FM Stations in WBNE Gain and Loss Area

<u>Call Sign</u>	<u>Channel/Class</u>	<u>City/State</u>	<u>60 dBu ¹¹</u> <u>Reference Distance</u>
WHQR	217C	Wilmington, NC	75.9
WMNX	247C1	Wilmington, NC	72.3
WKXB	260C1	Burgaw, NC	72.0
WGNI	274C1	Wilmington, NC	72.3
WKOQ	254C1	Jacksonville, NC	72.3
WQSL	222C2	Jacksonville, NC	52.2
WXQR-FM	288C2	Jacksonville, NC	52.2
WRNS-FM	236C	Kinston, NC	84.1
WSFL-FM	293C1	New Bern, NC	72.3

11) See Footnote 9 supra.

URBANIZED AREA OUTLINE MAP (CENSUS 2000)
Jacksonville, NC

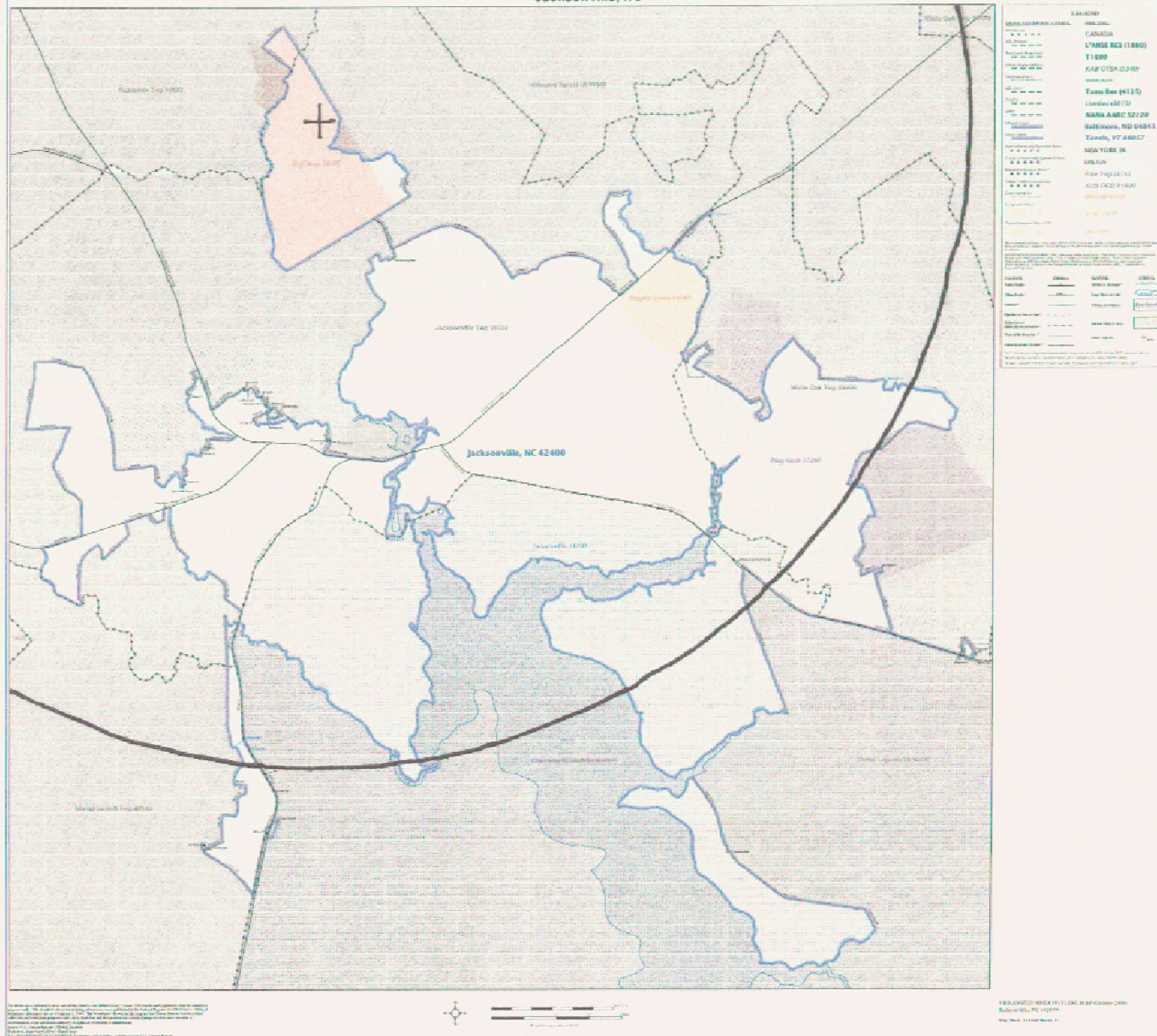


EXHIBIT #10

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

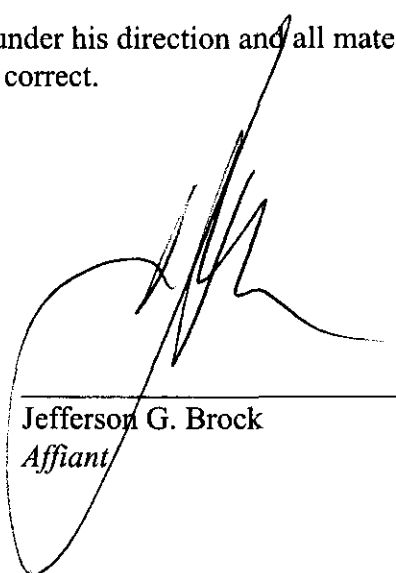
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Sea-Comm, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

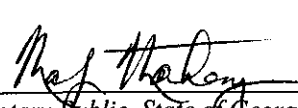
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 23rd day of March, 2004.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 23rd day of March, 2004.*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007

APPENDIX B

Statement of Greg Whitehead,
Town Administrator,
Town of Richlands, North Carolina
(April 7, 2004)

**Town
of
Richlands, North Carolina**

April 7, 2004

To Whom It May Concern:

My name is Greg Whitehead. I am the Town Administrator for Richlands, North Carolina and have been in this position for approximately 6 years. I have also been a resident of Richlands, North Carolina for approximately 4 years.

Myself and other residents of Richlands, North Carolina consider our town to be separate from the City of Jacksonville, North Carolina. Richlands has its own Post Office and Zip Code. We also have a Mayor and town council who govern our town. We have a Police and Fire Department and provide town services to our citizens. Richlands is a duly chartered, incorporated entity, of the State of North Carolina. There are businesses owned and operated by local residents within our town.

If there are any other questions concerning this issue, I may be reached at 910-324-3301.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Whitehead', with a long horizontal stroke extending to the right.

Greg Whitehead

APPENDIX C

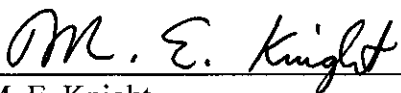
Declaration of M. E. Knight
(April 9, 2004)

DECLARATION

My name is M. E. Knight. I am a Vice President of Sea-Comm, Inc. and the General Manager of Sea-Comm, Inc.'s primary commercial FM radio broadcasting stations WBNE in Wrightsville Beach, North Carolina, WLTT in Shallotte, North Carolina, WBNU in Shallotte, North Carolina, WKXB in Burgaw, North Carolina, WSFM in Southport, North Carolina, and WWTB in Topsail Beach, North Carolina.

I have read the foregoing Petition for Rule Making, and except for those matters discussed in the Technical Statement of Jefferson G. Brock of the firm of Graham Brock, Inc. in St. Simon's Island, Georgia, dated March 23, 2004, and except for those matters of which the Commission may take official notice, I hereby state that the statements of fact contained in the Petition for Rule Making are true, correct, and complete to the best of my knowledge and belief.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of April, 2004.



M. E. Knight